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8 Attorneys for Plaintiff,
9 DAVID EKBLAD

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 DAVID EKBLAD, an individual,
13 Plaintiff,

14 v.

15 TARGET CORPORATION, a corporation; and,
16 DOES 1-10, inclusive,
17 Defendants.

CASE NO: 2:22-cv-00767-APG-NJK

~~PROPOSED~~ **REVISED
STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
PURSUANT COURT ORDER [ECF
NO. 22]**

18 Pursuant to FED.R.Civ.P.6, FED.R.Civ.P.26, LR 26-1, and LR 26-4, Plaintiff DAVID
19 EKBLAD (“Plaintiff”), by and through his counsel of record, LAGSTEIN LAW FIRM P.C. and
20 Defendant, TARGET CORPORATION (“Defendant”), by and through its counsel of record,
21 LINCOLN, GUSTAFSON & CERCOS and submitted a [Proposed] Revised Stipulation and Order to
22 Extend Disocvery Deadlines stipulating to a sixty (60) day continuance of the current discovery
23 deadlines. [ECF No. 21]

24 On May 30, 2023, the Court submitted an Order [ECF No. 23] GRANTING the Stipulation
25 and Order to Extend Discovery Deadlines subject to two caveats. The Court indicated that the extended
26 discovery cutoff will not be extended with respect to written discovery. Second, counsel must obtain
27 deposition dates now to ensure that they proceed before the extended discovery cutoff should the
28 mediation prove unsuccessful. Subject to the aforementioned caveats, the Court reset the discovery
deadlines as follows:

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EVENT	DEADLINES
Amend pleadings/ Add parties	Closed
Initial Experts	Closed
Stipulation with schedule for remaining depositions	June 6, 2023
Status report regarding mediation	August 1, 2023
Discovery cutoff	August 15, 2023
Dispositive motions	September 14, 2023
Joint proposed pretrial order	October 16, 2023 or 30 days after resolution of dispositive motions

Pursuant to the Court's Order [ECF No. 23], the parties hereto submit to the Court the following schedule for remaining depositions:

DEPONENT	DEPOSITION DATE
Alyssa Ho/Person Most Knowledgeable	July 31, 2023/ 9:30 a.m.
Miranda Cameron	July 31, 2023/ 3:00 p.m.
Steven Rodriguez	Pending potential subpoena
Sarah Milne	August 1, 2023/ 11:30 a.m.
Kyara Williams	August 1, 2023/ 1:30 p.m.
Dave Greger	August 1, 2023/ 3:30 p.m.
Peggy Jersic	August 2, 2023/ 9:30 a.m.
Dominique Saldana	August 2, 2023/ 11:30 a.m.
Barbara Lincoln	August 2, 2023/ 1:30 p.m.
Jenny Kekaouha	August 2, 2023/ 3:30 p.m.

IT IS SO STIPULATED AND AGREED

DATED this ____ day of June, 2023.	DATED this ____ day of June, 2023.
LAGSTEIN LAW FIRM, P.C.	LINCOLN, GUSTAFSON & CERCOS
<i>/s/ Eran Lagstein</i>	<i>/s/ Julie Funai</i>
ERAN LAGSTEIN, ESQ. Nevada Bar No. 7413 5940 S. Rainbow Blvd. Las Vegas, NV 89118 Attorneys for Plaintiff, DAVID EKBLAD	LOREN S. YOUNG, ESQ. Nevada Bar No. 7567 JULIE A. FUNAI, ESQ. Nevada Bar No. 8725 7670 W. Lake Mead Blvd., Suite 200 Las Vegas, NV 89128 Attorneys for Defendant, TARGET CORPORATION

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: June 12, 2023